

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Closed Captioning of Internet	)	MB Docket No. 11-154
Protocol-Delivered Video Programming:	)	
Implementation of the Twenty-First Century	)	
Communications and Video Accessibility	)	
Act of 2010	)	

**MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46(b) of the rules of the Federal Communications Commission (FCC),<sup>1</sup> the National Association of Broadcasters (NAB)<sup>2</sup> respectfully requests that the Commission grant a one-week extension of the deadline for all interested parties to submit reply comments in response to the above-captioned *Notice of Proposed Rulemaking (NPRM)*. Reply comments currently are due on October 28, 2011. NAB requests an extension of this deadline to November 4, 2011.

A substantial amount of substantive material was filed yesterday, October 18, 2011, in the comment round of the instant proceeding. At the time of this filing, the Commission's ECFS database indicates that more than 25 commenters filed in excess of 350 pages of discussion, argument, and data on the many complex questions raised in this proceeding. Absent a brief extension of the reply comment deadline, concerned parties will have considerable difficulty in reviewing, considering, and responding

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<sup>1</sup> 47 C.F.R. § 1.46(b).

<sup>2</sup> NAB is a trade association that advocates on behalf of free, local radio and television stations and also broadcast networks before Congress, the FCC, and the Courts.

thoughtfully to the initial filings under the unusually tight time frame of 10 days established for the reply round.

In addition, the groundbreaking nature of the Twenty-First Century Communications and Video Accessibility Act (CVAA) mandate regarding closed captioning for IP-delivered video programming warrants affording participants a modest extension of time so that they can provide more detailed responses to issues discussed in the comments. This docket concerns a wide range of technical, legal, and practical issues affecting multiple parties, many of which are novel to the Commission and to commenters in the proceeding.

This brief extension will not impede the Commission from meeting its statutory deadline to adopt rules in the instant proceeding; rather, the additional time provided for replies will serve the public interest by allowing for development of a more complete record upon which the Commission can base its implementation decisions.

Accordingly, NAB respectfully requests a one-week extension of the deadline for filing reply comments in response to the *NPRM*.

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**

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